



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 20, 2011

Ms. Sue Dixon
Payette National Forest
800 West Lakeside Avenue
McCall, Idaho 83638

Re: Forest Plan Integration of the Payette National Forest Wildlife Conservation Strategy,
Phase 1: Forested Biological Community, Draft Environmental Impact Statement
(EPA Region 10 Project Number: 11-005-AFS; CEQ Project Number: 20110014;
ERP Number: AFS-L65599-ID)

Dear Ms. Dixon:

The U.S. Environmental Protection Agency (EPA) has reviewed the Forest Plan Integration of the Payette National Forest Wildlife Conservation Strategy, Phase 1: Forested Biological Community Draft Environmental Impact Statement (DEIS). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Thank you for the opportunity to offer comment.

The DEIS proposes two action alternatives that propose to modify management direction in response to new information and/or changed conditions concerning wildlife habitat. This new management direction would be incorporated into the existing Forest Plan through a Forest Plan amendment to achieve eight Wildlife Conservation Strategy (WCS) needs. The needs are to restore old/large tree size habitats in the low to mid-elevation forests, retain large snags, and prioritize vegetative treatments to maximize benefits, identify and link habitats for wide-ranging carnivores, and balance WCS needs with multiple uses, tribal treaty rights, and other public needs.

The key differences between the action alternatives are that **Alternative B**, the Proposed Action, would reallocate about 247,000 acres from Management Prescription Category (MPC) 5.2 (Commodity Production Emphasis within Forested Landscapes), to MPC 5.1 (Restoration and Maintenance Emphasis within Forested Landscapes). Lands reassigned to MPC 5.1 would continue to be designated as lands considered suitable for timber production, and would allow exemptions from snag and coarse woody debris retention standards within the Wildland Urban Interface (WUI) lands in order to meet hazardous fuel reduction objectives. However, a new Guideline (WIGU20) would be included to encourage the Authorized Officer to meet both hazardous fuel reduction and wildlife habitat conservation/restoration objectives where possible.

Alternative C would reassign MPC 5.2 lands to MPC 3.2 (Active Restoration and Maintenance of Aquatic, Terrestrial, and Wildlife Resources), which would designate these forested acres as not suited for timber production, and would not include exemptions from snag

retention standards to meet hazardous fuel reduction objectives within the WUI. The two action alternatives would use different approaches to achieve a desired condition for forested lands that falls within the estimated Historic Range of Variability (HRV).

Our review comments on the DEIS focus on our general support for the Wildlife Conservation Strategy principles and alternatives, and on the concerns we have regarding the management exemption in the Wildland Urban Interface, the need to address high road densities and impacts from recreation, and the need for further information regarding potential implementation impacts to soils, nutrient cycling, invasive species, and road maintenance. We have assigned a rating of EC-2, Environmental Concerns - Insufficient information, to the DEIS and have enclosed an explanation of this rating. Our detailed comments are provided below.

Planning Principles and Directions

We commend the Forest Service for developing a Wildlife Conservation Strategy and support Forest Plan Amendments toward its implementation. In particular, we support:

- The six basic conservation principles used as the basis for this proposed Wildlife Conservation Strategy (WCS) and the eight identified needs for action.
- Desired conditions for ecosystem restoration that would move forest lands toward the HRV. We agree that pursuing desired conditions that are within the HRV would render forest lands and wildlife more resistant, resilient, and adaptable to stressors, including climate change (as per Noss (2001) and Fule et al. (2009) as stated in the DEIS, pgs. 88-89.)
- Restoring the role of fire on as many acres as practical within public health and safety constraints, where risks to vegetation or habitat attributes in short supply are acceptable, and in a manner consistent with overall multiple-use objectives to move forest conditions toward the HRV (p. 43).

Management within the Wildland Urban Interface

Both Alternatives B and C are projected to meet the desired conditions within HRV over time, however, with the management exemption within the Wildland Urban Interface (WUI) under Alternative B, the resulting stand conditions are anticipated to be more uniform with less patchy distribution and contain fewer snags and logs than with Alternative C, which is attempting to mimic more natural stand conditions (p. 51). We support the new proposed Guideline WIGU20 under Alternative B, which would encourage the Authorized Official to strive to achieve both hazardous fuels reduction and wildlife habitat conservation/restoration objectives where possible within the WUI as a means to lessen this difference. However, the low to mid-elevation ponderosa pine forests, which are most in need of restoration, are a significant component of the WUI (76,590 acres), and the affected Tribes are concerned that hazardous fuel reduction within WUIs may impact sustainability of some habitats important to sensitive tribal species (p. 348). If the WUI continues to expand in size and influence upon NFS lands, the portion of the forest that would potentially provide lower quality habitat than what is envisioned under Alternative C would continue to increase. As a compromise, we recommend the Forest Service consider the following:

Recommendation: Adopt a modified approach to applying the WUI exemption. To conserve wildlife habitat components and to respond to the Tribes' concerns, modify Alternative B to have the WUI exemption applied only to the 62,160 acres that are within the mixed 2 and lethal fire regimes, and remove the exemption (as in Alternative C) within the low to mid-elevation ponderosa pine forests within the nonlethal and mixed 1 fire regimes. If Alternative B is applied overall, at a minimum we recommend that the use of Guideline WIGU20 be evaluated for its effectiveness in achieving both objectives.

Roads and Recreation Access

We are concerned that existing high road densities and the potential for additional road construction and reconstruction may reduce the potential benefits of the WCS. The DEIS frequently states (for example, pp. 203, 208, 209) that high road densities are a problem for habitats and wildlife species in need of recovery. The highest road densities occur at lower elevations and are associated with lower densities of large diameter trees, snags, and logs due to firewood collection, logging, and road building. The high road densities also increase vulnerability of wildlife to incidental mortality, disturbance during critical time periods, incidental trapping near roads, and/or displacement (p. 221). Alternative B would include a guideline to restrict road construction or reconstruction and a guideline to manage the firewood program to retain large diameter snags; Alternative C would include standards for these two activities (p. 305, Table 3-61). While these proposed guidelines and standards may be helpful, neither appears to direct that road densities be reduced.

Recommendations: Consider including a standard or guideline to substantially reduce existing road densities through road decommissioning and obliteration, particularly in the lowland ponderosa pine forests, to reduce long-term impacts to species and habitats. If Alternative B is selected, consider applying the proposed standards in Alternative C to roads and snag retention, rather than the proposed Alternative B guidelines, to strengthen means to prevent further road impacts and loss of snags.

We share the Forest Service's concern that pressures to increase transportation and recreational access on National Forest System lands are likely to continue, and that these pressures will make it difficult to manage a network of habitats across the landscape (p. 60). In addition to the recommendations above, we support amendments to the Forest Plan, such as Wildlife Guideline WIGU19, that would address human impacts during wolverine critical denning period by calling for annual monitoring of winter recreation in high elevation habitats.

Recommendations: If monitoring results indicate negative effects to wolverine, apply needed restrictions to reduce or eliminate impacts. Include in the Final EIS information about past Forest Plan monitoring – whether the required monitoring was funded, implemented, and the results used to modify management actions. Identify other permitted human activities that may require monitoring to determine impacts to sensitive species and habitats.

Issues not Evaluated in the DEIS

As noted on page 395, Alternative B would likely result in timber outputs similar to those predicted under Alternative A, and could even result in a slight increase over Alternative A. Alternative B, however, moves away from the traditionally high volume tree removal methods of regeneration harvest and overstory removal. As a consequence, more acres would have to be treated to achieve the same volume of wood products. We are supportive of broad scale treatment in order to move as much of the landscape as possible toward desired conditions. We note, however, that this shift in management may have implications for soil disturbance and erosion; nutrient cycling; spread of invasive species; and road maintenance. These areas of concern are mentioned in passing in the DEIS (Section 3.2.5.5) but are not quantified nor discussed in the context of mitigation.

Recommendation: In the Final EIS, provide additional analysis of impacts associated with broad scale thinning under Alternative B. If these impacts and their mitigation measures were considered as the 2003 Forest Plan was developed, please incorporate the relevant sections by reference.

We appreciate the opportunity to participate in this important Forest Plan amendment process. If you have questions or would like to discuss these comments, please contact me at (206) 553-1601 or Elaine Somers of my staff at (206)553-2966 or at somers.elaine@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure



**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.